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November 13, 2023

VIA ECF

The Honorable Mary Kay Vyskocil  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street, Room 2230  
New York, New York 10007

Re: Mazur v. UGS Herman, LLC, No. 23 Civ. 8839 (MKV)

Dear Judge Vyskocil:

We represent the seven Plaintiffs in this Action against UGS Herman, LLC ("UGS"). Per the Court's Order of November 6, 2023 (ECF No. 12), Plaintiffs submit this letter to advise that they will not file an amended complaint and to request pursuant to Rule 2(G) of the Court's Individual Rules of Practice in Civil Cases additional time to oppose Defendant's anticipated motion to dismiss. This is the first time that Plaintiffs make this request.

Defendant's motion is due by November 27, 2023 (ECF No. 12). Per Local Rule 6.1(b), Plaintiffs' opposition is due fourteen days later, by December 11, 2023. The undersigned, who serves as Plaintiffs' lead counsel, will be out of the country from November 18 through December 10, 2023. As such, the undersigned respectfully requests a three-week extension, until January 2, 2024, to draft and file Plaintiffs' opposition. The undersigned emailed defense counsel about this request at 11:51 a.m. today and, in response, received an auto-generated message a minute later stating defense counsel was in a deposition. There was no other response from defense counsel.

We thank the Court for its time and attention to this matter.


Respectfully submitted,

/s/ Gianfranco J. Cuadra

Gianfranco J. Cuadra

**GRANTED. Plaintiffs' opposition shall be due January 2, 2024.  
Defendant's reply shall be due January 12, 2024. SO ORDERED.**

Date: 11/13/2023  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge